

Subject: FW: Kleiman v. Wright: Subpoena to Brendan Sullivan
Date: Friday, September 6, 2019 at 1:04:48 PM Eastern Daylight Time
From: Velvel Freedman
To: Kyle Roche, Joe Delich, Andrew S. Brenner

Velvel (Devin) Freedman

Partner

Roche Freedman LLP

Southeast Financial Center

200 S Biscayne Blvd

Suite 5500

Miami, FL 33131

(t) (305) 753-3675

(@) vel@rochefreedman.com

From: "Christine.Walz@hklaw.com" <Christine.Walz@hklaw.com>

Date: Friday, September 6, 2019 at 1:01 PM

To: "vel@rochefreedman.com" <vel@rochefreedman.com>

Subject: RE: Kleiman v. Wright: Subpoena to Brendan Sullivan

Vel: I have conferred with my client and we cannot agree to the limitations you have offered with regards to the subpoena. We are going to move for a protective order under the rules, in advance of the deposition scheduled for Tuesday, and my client does not plan on appearing on Tuesday. In our motion, we will request a stay of that date until the motion for a protective order has been fully briefed and ruled on.

Sincerely,

Christine Walz | Holland & Knight

Partner

Holland & Knight LLP

31 West 52nd Street | New York, New York 10019

Phone 212.513.3368 | Fax 212.385.9010

christine.walz@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

From: Velvel Freedman <vel@rochefreedman.com>

Sent: Wednesday, September 04, 2019 7:41 PM

To: Walz, Christine N (NYC - X73368) <Christine.Walz@hklaw.com>

Subject: Re: Kleiman v. Wright: Subpoena to Brendan Sullivan

[External email]

Christine,

After receipt of your letter, our conference call, and in the interests of working this out amicably, Plaintiffs would offer to narrow the subpoena to be:

- (1) Appear for a deposition to confirm, under oath, the statements attributed to Craig Wright in the interview were made by Craig Wright and are accurate;
- (2) Provide a copy of any recording of the interview (or a sworn statement that no such recording exists).

Please let us know if this works for your client.

Thanks,

-Vel

Velvel (Devin) Freedman

Partner

Roche Freedman LLP

Southeast Financial Center

200 S Biscayne Blvd

Suite 5500

Miami, FL 33131

(t) (305) 753-3675

(@) vel@rochefreedman.com

From: "Christine.Walz@hklaw.com" <Christine.Walz@hklaw.com>

Date: Wednesday, September 4, 2019 at 1:26 PM

To: "vel@rochefreedman.com" <vel@rochefreedman.com>

Subject: RE: Kleiman v. Wright: Subpoena to Brendan Sullivan

Following up on our conversation, would you please explain your proposal for narrowing the subpoena so that I can share the details of it in writing with my client?

Sincerely,

Christine Walz | Holland & Knight

Partner

Holland & Knight LLP

31 West 52nd Street | New York, New York 10019

Phone 212.513.3368 | Fax 212.385.9010

christine.walz@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

From: Walz, Christine N (NYC - X73368)

Sent: Wednesday, September 04, 2019 11:54 AM

To: 'vel@rochefreedman.com' <vel@rochefreedman.com>

Subject: Kleiman v. Wright: Subpoena to Brendan Sullivan

Counsel: Please see attached letter concerning the subpoena served on Brendan Sullivan.

Sincerely,

Christine Walz | Holland & Knight

Partner

Holland & Knight LLP

31 West 52nd Street | New York, New York 10019

Phone 212.513.3368 | Fax 212.385.9010

christine.walz@hklaw.com | www.hklaw.com

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